

Repeat Requires Improvement Framework

What you told us at our last external co-production event:

- Our approach to requires improvement services should be flexible and proportionate
- There is more we can do at provider level to encourage services persistently rated requires improvement to improve, including targeting our regulatory response at the right leadership level
- It is not only CQC's responsibility to encourage improvement: organisations can play a role by sharing information and working in cooperation
- There is more that CQC can do to signpost providers to support and guidance from relevant organisations that will help them improve
- There are concerns about the link between financial investment and good quality, sustainable care

What we have learnt from external co-production (slide 11):

Our proposed approach

- You were unsure whether there should be a fixed number of inspections to trigger action
- CQC should consider the spectrum of risk and quality within requires improvement services
- Inspectors need to consider how safe people are, living in or using a service
- CQC needs to get the balance right with timescales. Services need time to improve but timescales should be tight enough to focus providers on improvement

Our next steps

- We are proposing minimum action that can be taken at each consecutive RI rating, enabling inspectors to use their judgement flexibly and proportionately
- We will always prioritise and respond to risk
- We are exploring whether the 6 month rule for a focused inspection to change an overall rating can be changed

Targeting the right level

- CQC needs to take action at the right level. Is the failure to improve due to service-level issues, or provider-level issues, such as leadership, direction and support to service managers
- You suggested CQC could award a cumulative rating for the provider as a whole (similar to hospital trust ratings)
- You suggested a trigger of 25% of a provider's services rated as Requires Improvement should prompt further action

Our next steps

- We are exploring how we can engage, inspect and take action at provider level where issues are identified, rather than service level. This includes thresholds prompting provider level inspection
- Our work on changing the unit of registration will enable us to take action at the right level
- We are exploring how we could report on rating history and improvement trajectory at a service and provider level in the future

Supporting providers to improve

- You suggested providers should work closely with CQC to monitor their improvement
- You agreed some providers need support and guidance to achieve and sustain improvement. Better links are needed with organisations that can provide support
- A meeting between CQC, provider and key agencies should agree on an improvement plan. Progress should be monitored between inspections
- CQC should consider a provider's financial investment as part of their plan and encourage smaller providers to work together financially to improve

Our next steps

- Exploring how we can engage, inspect and take action where issues are at provider level, rather than service level. This includes thresholds prompting provider level inspection
- Our work on changing the unit of registration will enable us to take action at the right level
- Exploring how to report on rating history and improvement trajectory at a service and provider level in the future
- Providers' finances in this context are out of scope for CQC, but we welcome provider innovation

Possible action for when a service is repeatedly requires improvement (slides 12 - 14):

First requires improvement rating

- Ongoing monitoring
- Letter to provider and commissioners explaining that we may consider a subsequent requires improvement rating as a breach of Regulation 17
- Consider proportionate enforcement action
- Signposting to resources that can support improvement

Second requires improvement rating

- Ongoing monitoring
- Hold Management Review Meeting if there are breaches
- Proportionate enforcement action
- Consider if there has been a breach of Regulation 17
- Request action plan with timescales agreed with provider and commissioners
- CQC meeting with provider, registered manager, and commissioners to discuss concerns, improvements needed, and support
- For Requires Improvement with breach in a Key Question, consider if this impacts on Well-Led

Third requires improvement rating

- Ongoing monitoring
- Hold Management Review Meeting to consider Regulation 17 and any other breaches
- If Well-Led is rated inadequate the service may still be rated requires improvement overall, unless it meets the characteristics of inadequate
- Consider using requirement conditions, warning notices or other appropriate enforcement action depending on risk and/or lack of improvement